

Phillips v. Collin Cnty. Cmty. Coll. Dist., et al.

Exhibit B:
Deposition of
Michael Phillips

Joseph Michael Phillips 3/22/2023

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

| | | |
|--------------------------|---|---------------------|
| JOSEPH MICHAEL PHILLIPS |) | |
| |) | CIVIL ACTION NUMBER |
| Plaintiff, |) | |
| |) | |
| v. |) | 4:22-cv-184 |
| |) | |
| COLLIN COMMUNITY COLLEGE |) | |
| DISTRICT, et al., |) | |
| |) | |
| Defendants. |) | |

ORAL DEPOSITION OF

JOSEPH MICHAEL PHILLIPS

MARCH 22, 2023

VOLUME 1 OF 1

ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS, produced as a witness duly sworn by me at the instance of the Plaintiff, was taken in the above styled and numbered cause on MARCH 22, 2023, from 9:18 AM to 12:42 PM, before Beth Howard, CSR in and for the State of Texas, reported by Machine Shorthand, at Pacific Place, located at 1910 Pacific Avenue, 14th Floor, Conference Room 2, Dallas, Texas, pursuant to the Federal Rules of Civil Procedure, Notice of Deposition, and the provisions stated on the record or attached hereto.

Stormy Jackson Reporting
stormyrpr@outlook.com

Joseph Michael Phillips 3/22/2023

A P P E A R A N C E S

FOR THE PLAINTIFF:

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ALSO PRESENT:

Monica Velazquez, Esq.
General Counsel
Collin College

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1 (OATH ADMINISTERED BY THE REPORTER.)

2 JOSEPH MICHAEL PHILLIPS,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. CRAWFORD:

6 Q. Good morning.

7 A. Good morning.

8 Q. Would you please state your name for the
9 record?

10 A. Joseph Michael Phillips.

11 Q. Dr. Phillips, we are here today to take your
12 deposition.

13 And I want to make sure the one agreement
14 that you and I have as we go forward is that you
15 understand my questions --

16 A. Um-hmm.

17 Q. -- because if you don't understand my
18 questions, you're not able to give your best answers,
19 and that's what we're looking for.

20 So if at any time you don't understand my
21 question or it's confusing or doesn't make sense to you,
22 please let me know, and we'll work through it and -- to
23 make sure that you understand what I'm asking, and then
24 I'll understand what you're answering.

25 A. Okay. Absolutely.

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1 A. An adjunct is a temporary, yeah, or a -- yeah,
2 not a full-time employee. It's not -- you're not a
3 permanent employee there. You're paid as a
4 semester-by-semester worker.

5 Q. Okay.

6 A. Okay. And so I taught classes for the History
7 Department as a graduate student. I taught Journalism
8 classes -- a History of Journalism class for the
9 Journalism Department. I did continuing education for
10 them.

11 And then, finally, after that, I continued
12 adjuncting, but then I also got a job at the Center for
13 American History in Austin, Texas. That's an historical
14 archive.

15 And I was hired to do a book on the history
16 of Texas House Speakers. And part of the job was we
17 interviewed all the living Speakers, including the
18 current one at that time, Tom Craddick. And we wrote a
19 book based on those interviews, and it was about the
20 history of that office.

21 Then I got hired by Collin College in 2007,
22 and was a full-time history professor.

23 Q. And you did that up until --

24 A. Last year.

25 Q. May of 2022?

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1 A. No, that was -- The content of the letter, you
2 know, he asked me, you know, what happened to me. I did
3 not -- I was not involved in the writing of the -- of
4 this.

5 Q. Did you see that language before the petition
6 went out?

7 A. That, I don't recall. I was aware of it after
8 it came out.

9 (DEPOSITION EXHIBIT 6 MARKED.)

10 Q. (BY MR. CRAWFORD) I've handed you what I've
11 marked as Exhibit 6.

12 Do you recognize this document?

13 A. It appears to be one of my contracts from 2019,
14 yes.

15 Q. And turning to the third page --

16 A. Um-hmm.

17 Q. -- of the exhibit, is that your signature?

18 A. Yes.

19 Q. Did you read the contract before you signed it?

20 A. I did indeed.

21 Q. Okay. The first paragraph says that this
22 contract provides for "a term of three academic
23 years" --

24 A. Right.

25 Q. -- "beginning on the 14th day of August, 2019,

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1 and ending on the last scheduled day or otherwise, as
2 directed by the college, in May of 2022," and it defines
3 that as "the Term."

4 A. Um-hmm.

5 Q. Did you serve the complete three-year term
6 under this contract?

7 A. Yes, I did.

8 Q. Turn to Paragraph 5 of the contract, and I'll
9 ask you to read that to yourself.

10 A. Okay.

11 Q. By signing the contract, you agreed to
12 Paragraph 5, correct?

13 A. Yes, as I understood them.

14 Q. Okay. And Paragraph 5 specifically says that
15 "the contract is subject to Collin College's core
16 values" --

17 A. Um-hmm.

18 Q. -- and that the faculty member agrees to comply
19 with the college's core values?

20 A. Um-hmm.

21 Q. Did you ask what was meant by "core values"
22 when you entered into the contract?

23 A. I have in -- on occasion asked for
24 clarification, because they're vague.

25 MR. CRAWFORD: I'll object as

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1 finish quoting your doctor's note, and then you say,
2 "Consider that as a template for your doctor. I will
3 forward this today to my dean and associate dean and
4 request to be allowed to teach exclusively online if the
5 college goes forward with its plans to open this fall.
6 Should the college say no, then the request, and the
7 failure to promote reasonable accommodations, will be on
8 the record should any further action be necessary."

9 Did I read that correctly?

10 A. Yes.

11 Q. And this concerns your personal work conditions
12 at the college, correct?

13 A. Yes. But I was giving advice, since the
14 college had not provided any instructions at that point
15 as to if people were, you know, undergoing cancer
16 treatment or had other issues that could make them very
17 vulnerable. We were all vulnerable, but some people
18 were more vulnerable than others.

19 Q. Was this post addressing your displeasure with
20 the administration for its lack of leadership concerning
21 reopening?

22 A. I didn't want friends to die, you know. I knew
23 people who were severely immunocompromised, and I wanted
24 them to take steps to ensure that they would be safe.

25 Q. And your concern was with in-person teaching at

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1 the college during the pandemic?

2 A. Yeah. Being on campus -- I'm trying to
3 remember. I think at that point we didn't -- Did we
4 even have a vaccine at that point? I don't think so.

5 Q. Well, that's a good question. Do you know when
6 you made this post?

7 A. No. No, I don't remember.

8 Q. Okay.

9 A. Yeah. No. But, in any case, the pandemic was
10 raging, and hundreds of people were dying a day, you
11 know. One of my very good friends at the college has a
12 severely immunocompromised husband, and she was
13 terrified that she was going to bring the virus back
14 home to him.

15 Q. So this post concerns your criticism of the
16 administrations's approach to running the school?

17 MR. GREUBEL: Objection, form.

18 A. I wouldn't call it a criticism.

19 Q. (BY MR. CRAWFORD) You would not?

20 A. No.

21 Q. What would you call it?

22 A. I would call it advice. I was hoping people,
23 you know, would be aware that there were steps they
24 could take to try to maximize their safety. That's -- I
25 don't see that -- I'm trying to keep people safe. I

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1 don't see that as criticism.

2 Q. And you thought keeping -- that your reference
3 to the college failing to make a reasonable
4 accommodation for you --

5 A. Well, they --

6 Q. -- was educating the public?

7 A. Yeah. I said "if they don't." And so, you
8 know, because I think that if someone's severely
9 immunocompromised, I think it's a reasonable
10 accommodation to provide remote work.

11 Q. And you say that "it will be on the record
12 should any further action be necessary."

13 what sort of further action are you
14 referring to?

15 A. Consultation with an attorney.

16 Q. That would involve your personal situation,
17 correct?

18 MR. GREUBEL: Objection, form.

19 A. No. I'm giving advice to other people.

20 I did not consult an attorney about this.
21 I really wanted to keep my peers -- meaning faculty
22 members, staff members, and the public -- safe.

23 Q. (BY MR. CRAWFORD) Did you -- did you request to
24 teach exclusively online?

25 A. Yes.

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1 the imbalance of power between the professor and the
2 student, and by the professor recommending it, it would
3 seem like a mandate, which would violate the Governor's
4 order?

5 MR. GREUBEL: Objection, form.

6 A. I don't recall her ever saying any of that.

7 Q. (BY MR. CRAWFORD) Did you ask her to clarify
8 it?

9 A. I was trying to find out can we talk about
10 masks.

11 Q. After that meeting with Dr. O'Quin, did you
12 have any follow-up meetings with Dr. O'Quin about what
13 she meant at that meeting?

14 A. Well, later on, we talked about it, yeah.

15 Q. In what context?

16 A. I was telling her that, number one, it's a
17 matter of public concern. It's relevant to my
18 coursework.

19 There was an assignment we went over
20 that dealt with previous pandemics, and I spoke about it
21 in the context of, you know, during the influenza
22 pandemic of 1918-1919, that there anti-mask leagues.
23 And I said, "You know, the thing about history is
24 sometimes there are parallels. It doesn't exactly
25 repeat, but there are parallels."

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1 yeah, I had trouble determining the logic of that.

2 Q. And this related to the syllabus used for the
3 classes at Collin College?

4 A. Right. Yeah.

5 Q. We're done with that one?

6 A. Okay.

7 (DEPOSITION EXHIBIT 10 MARKED.)

8 Q. (BY MR. CRAWFORD) I'll hand you what I've
9 marked as Exhibit 10.

10 A. Um-hmm.

11 Q. And we've mentioned a couple of times your
12 letter to the Dallas Morning News about the removal of
13 Confederate monuments in Dallas.

14 A. Right.

15 Q. Is Exhibit 10 a copy of your article?

16 A. Yes.

17 Q. And you submitted this in 2017?

18 A. Right.

19 Q. And it's towards the very end -- And I
20 apologize that the pages aren't numbered.

21 A. Yeah, yeah.

22 Q. But at the very end, you actually -- it looks
23 like you signed it.

24 A. Yeah.

25 Q. And you used your collin.edu email address?

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1 the text in an email."

2 And you're one of the folks that is listed
3 that should --

4 A. Right.

5 Q. So the next page is an August 22, 2017
6 memorandum, but it's -- in the "To" line it's blank, and
7 the "From" line is blank.

8 So my first question is: After you wrote
9 the article that's Exhibit 10 to the Morning News --

10 A. Right.

11 Q. -- did you receive a memo that was similar to
12 this memo?

13 A. We were all summoned to a meeting with our dean
14 and Provost, and we were made -- in my case -- I don't
15 know exactly what happened with everyone else.

16 In my case, I was asked to read this, and I
17 read it, and then we had a discussion about it.

18 And in that discussion, I mentioned that I
19 felt this was an unconstitutional act that would chill
20 speech. In fact, I was very reluctant to engage in
21 public discourse for a while. I actually avoided it for
22 a while.

23 And I was told when I applied for my
24 contract renewal, Rebecca Orr, who was the chair --
25 she's the wife of a board member -- she said, "Keep a

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1 sounds like the college is saying otherwise.

2 But this was what we were told. I assumed
3 this was an institution-wide decision. And the public
4 had the right to know, because it affected their health.

5 This is about the college. This wasn't about her.

6 (DEPOSITION EXHIBIT 17 MARKED.)

7 Q. (BY MR. CRAWFORD) Let me hand you what's been
8 marked as Exhibit 17.

9 This is an Employee Discipline Form dated
10 September 29th, 2021 from Dr. O'Quin to you.

11 Do you recall receiving this?

12 A. Yes, I do.

13 Q. And you received this as a result of some
14 apparent complaints by students about comments that you
15 made in the classroom, correct?

16 A. A student, because there's only one student
17 complaint. But, yeah, that's what this was about.

18 Q. Other than receiving this form from Dr. O'Quin,
19 this discipline form, did you receive any other
20 discipline as a result of the student complaint?

21 A. This is where I was made to do the performance
22 improvement plan, because of this.

23 Q. Any other discipline -- So let me step back.

24 So before, with the post of the PowerPoint,
25 you thought you had been put on the performance plan as

The Dallas Morning News



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OPINION

Dallas' Confederate memorials scream 'white supremacy'

Monuments monumentally endorse a set of values.



The Confederate Memorial is pictured at Pioneer Park in downtown Dallas, Tuesday, July 18, 2017. Dallas is looking at the history of its Confederate monuments and considering whether they should be removed, relocated or

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contextualized in some way. (Tom Fox/The Dallas Morning News) (Tom Fox / Staff Photographer)



By Michael Phillips|Contributor and Edward Sebesta|Contributor
6:26 AM on Aug 4, 2017



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If someone is supposedly a hero fighting for a cause, then the cause that person fought for must have been heroic as well. A monument to a movement or nation or event inherently defines that movement, nation, or event as being glorious. Monuments monumentally endorse a set of values.

This effort to shape the public's understanding of the past is a method of shaping the values of the present. And every Confederate monument standing today loudly proclaims that, whatever might be said about civil rights and racial equality in contemporary political discourse, the enduring values of this place, this city, and this people is white supremacy.

As Kathryn Allamong Jacob masterfully explains in her book, *Testament to Union: Civil War Monuments in Washington, D.C.*: "Mundane as they may appear, ubiquitous as they may be, public monuments constitute serious cultural authority. They are important precisely because, by their mere presence and their obvious expense, they

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impose a memory of an event or individual on the public landscape that orders our lives."

Confederate names and monuments in Dallas



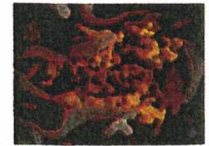
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Monuments in public spaces represent what the city, county, state or nation seeks to represent as its core beliefs. They shape identity, and shaping identities and

influencing values is a strategy to influence, if not control, the future.

Discussion of Confederate monuments has focused on what offense they might give to African-Americans, but the discussion fails to acknowledge that others are also poisoned with this message of white supremacy. It is not surprising that white nationalist Richard Spencer grew up in Dallas and marches in defense of Confederate monuments, for he grew up in the shadow of such edifices.

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Every Confederate monument proclaims that African-American lives, their suffering, and the crimes committed against them really don't matter. For if African-American lives mattered these monuments would be gone. These monuments instruct the public, including judges, police officers and jurors that fair treatment under the law for African-Americans represents an avoidable inconvenience. The plaque at the Lew Sterrett Justice Center honoring Robert E. Lee in the hallway to the Dallas County

Central Jury Room instructs those jurors that African-American freedom is expendable.

3

4

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These monuments also instruct African-American youth that, despite all the claims made in schools, their hopes and dreams are not treasured by society. British journalist of Barbadian descent, Gary Younge, in his book, *No Place Like Home: A Black Briton's Journey Through the American South*, describes his feelings while walking amidst a series of 100-year-old statues depicting Confederate leaders on Monument Avenue in Richmond, Virginia:

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"I turned around to walk back up Monument Avenue, feeling angry and confused ... I had spent about an hour walking along a road in which four men who fought to enslave me ... have been honoured and exalted. I resented the fact that on the way to work every day, black people have to look at that. Imagine how black children must feel when they learn that the people who have been raised and praised up the road are the same ones who tried to keep their great-great-grandparents in chains."

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Confederate monuments are an ongoing source of alienation. We should not be surprised that when alienation is taught in schools, in political debates, and in public spaces that young people receive the message and become alienated themselves.

Remove the memorials

This city has a massive Confederate War Memorial near the Dallas Convention Center.

This work features statues of Confederate generals Robert E. Lee, Stonewall Jackson and Albert Sidney Johnston, as well as the Confederacy's only president, Jefferson Davis. The figures surround a statue of a Confederate soldier atop a 60-foot pillar. One inscription on the monument pays tribute to "the genius and valor of Confederate seamen."

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that features an equestrian statue of the commander of the Army of Northern Virginia near a replica of a slavery-era plantation home. Multiple sculptures referencing the Confederacy and the Great Seal of the Confederate States of America can be found at Fair Park. A Confederate flag hangs at Fair Park's Great Hall, which also includes a massive medallion on one wall incorporating a female figure representing the Confederacy. A mural featuring portraits of Confederate generals John Bell Hood, Albert Sidney Johnston and Dick Dowling adorns another wall.

Although the name of Robert E. Lee Elementary School will be changed, there are numerous other Dallas schools named after prominent Confederate military officers and political leaders: William Cabell, William H. Gaston, John Ireland, Sidney Lanier, Stonewall Jackson, Albert Sidney Johnston, John H. Reagan and Oran M. Roberts.

Some of the people honored have no direct relationship to Dallas history; while some figured prominently in the city's past, but all willingly, and often enthusiastically, participated in a treasonous war fought to preserve chattel slavery, that caused the deaths of 750,000 Americans and the maiming of tens of thousands more, and attempted to tear the nation asunder. The time has come for these tributes to the Confederacy to come down and for public buildings that bear the names of those whose fame is primarily tied to their service to a slave republic to assume a new identity.

These monuments have stood mostly unchallenged for decades because the American history textbooks used in public schools are in themselves largely, metaphorically, Confederate monuments, which obscure, if not erase history, diminish the value of African American lives, and train generations of Americans to not comprehend the horrors of human bondage as practiced in the United States.

Robert E. Lee's legacy

Most loathsome of Dallas's monuments, and perhaps singularly loathsome of Confederate monuments everywhere is the one-third replica of Robert E. Lee's plantation home, Arlington House, in Lee Park. Weddings frequently take place there. Plantations were sites of the rape, beating, and torture of slaves. The faux plantation features a portrait of Robert E. Lee, a white supremacist who fought for slavery and white supremacy. The participants in such weddings demonstrate by their actions that they consider the horrors of slavery a triviality. They befoul their marriages and bequeath to any heirs a legacy of racial callousness and indifference to evil.

The Robert E. Lee so elaborately honored at Lee Park and elsewhere in Dallas was a harsh slave master. Wesley Norris, who suffered the misfortune of being owned by Lee, recounted that he endured a beating after he attempted to escape in 1859. When Norris was captured, Lee said he would teach Norris "a lesson he would never forget." Norris offered the following account of what happened next: "He then ordered us to the barn, where, in his presence, we were tied firmly to posts by a Mr. Gwin, our overseer, who was ordered by Gen. Lee to strip us to the waist and give us fifty lashes each, excepting my sister, who received but twenty; we were accordingly stripped to the skin by

the overseer, who, however, had sufficient humanity to decline whipping us; accordingly Dick Williams, a county constable, was called in, who gave us the number of lashes ordered; Gen. Lee, in the meantime, stood by, and frequently enjoined Williams to lay it on well, an injunction which he did not fail to heed; not satisfied with simply lacerating our naked flesh, Gen. Lee then ordered the overseer to thoroughly wash our backs with brine, which was done."

During the Civil War Lee stated that slavery represented the most appropriate relationship between whites and African-Americans since African-Americans were an inferior race. After the Civil War, Lee campaigned against granting African-Americans civil rights. He stated in testimony to the Reconstruction Committee of Congress that Virginia would be better off if it got rid of African-Americans.

This is the man families honor when they hold weddings at Lee Park at the replica of Arlington House. Consciously or not, they celebrate their marriage by paying tribute to the slave past. For this reason, the clergy should not agree to perform weddings at Arlington House. Whatever the resolutions, position papers or published policies of denominations might be regarding race, whatever fine phrases these proclamations might say, religious leaders of prominent churches, temples and other places of

worship who perform marriages at the Arlington House replica in Dallas will be complicit in a Robert E. Lee plantation wedding.

Organizations that meet at the replica plantation house show contempt for African-Americans as well. When the owners of properties like The Claridge, 21 Turtle Creek, 3525 Turtle Creek, The Mayfair, The Vendôme and The Wyndemere take part in lighting up Lee Park, we see how the upper classes of Dallas embrace a duplicate Robert E. Lee plantation and adorn it to celebrate the birth of Christ. What does it say about the Dallas Christian community that this doesn't raise a cry of disgust?



The Confederate Memorial in Greenwood Cemetery in Dallas is across Central Expressway from City Place in Uptown. Photographed Wednesday, August 2, 2017. (Guy Reynolds/The Dallas Morning News) (Guy Reynolds)

Secession was about slavery

These monuments glorify violent insurrectionists who sought to tear the

United States of America apart. The implied endorsement of the Confederate cause is toxic to today's politics. Multiple polls, both national and statewide, have shown disturbingly high percentages of the Texas public supporting secession. In May 2016, the Texas state Republican Party platform committee at their convention in Dallas astonishingly voted down a secession resolution by only 16 to 14 with one abstention.

It might be thought that such a resolution would not get a single vote or even be presented for a vote by a mainstream political organization. This past June, participants in the Texas Boys State government education program sponsored by the American Legion, during an exercise in which they portrayed members of the state Legislature, voted for the secession of Texas from the United States. The tributes to the Confederacy that pockmark the landscape are teaching the state's next generation of leaders that treason is an honorable political option.

Sadly, Americans today need to be reminded why secession took place in 1861. The purpose of the Confederacy was clearly to preserve white dictatorship. Confederate Vice-President Alexander H. Stephens made this clear in his infamous "Cornerstone Speech" on March 21, 1861, when he said that the Confederate nation that he and the other

leaders of the secession movement hoped to establish rested "upon the great truth that the negro is not equal to the white man; that slavery, subordination to the superior race, is his natural and normal condition. This, our new government, is the first, in the history of the world, based upon this great physical, philosophical and moral truth."

In the "Declaration of Causes Which Impel Texas to Secede from the Federal Union," Feb. 2, 1861, of the Texas secession convention, repeatedly cited slavery as the reason for leaving the Union:

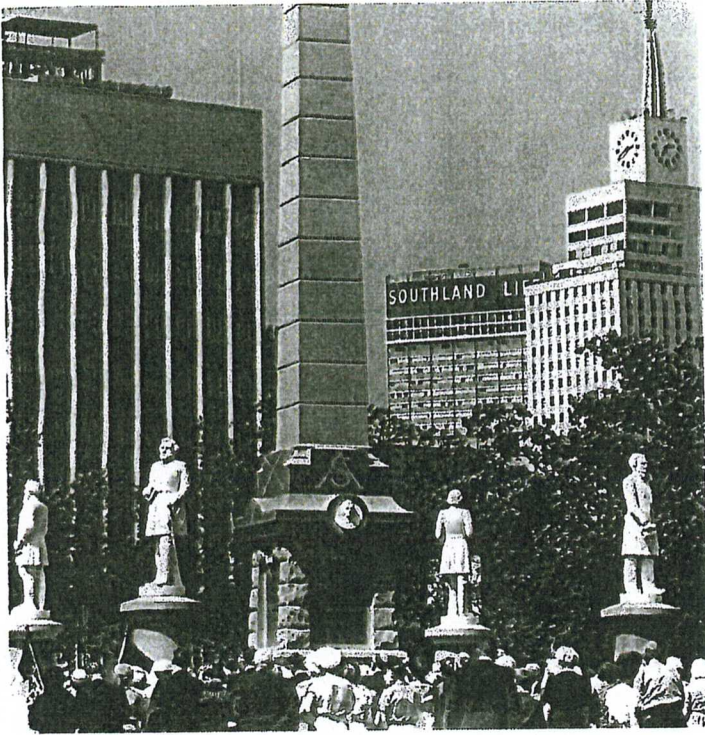
"In all the non-slave-holding States, in violation of that good faith and comity which should exist between entirely distinct nations, the people have formed themselves into a great sectional party, now strong enough in numbers to control the affairs of each of those States, based upon the unnatural feeling of hostility to these Southern States and their beneficent and patriarchal system of African slavery, proclaiming the debasing doctrine of the equality of all men, irrespective of race or color — a doctrine at war with nature, in opposition to the experience of mankind, and in violation of the plainest revelations of the Divine Law. They demand the abolition of negro slavery throughout the confederacy, the recognition of political equality between the white and the negro races, and avow their determination to press on their crusade

against us, so long as a negro slave remains in these States ...

That in this free government all white men are and of right ought to be entitled to equal civil and political rights; that the servitude of the African race, as existing in these States, is mutually beneficial to both bond and free, and is abundantly authorized and justified by the experience of mankind, and the revealed will of the Almighty Creator, as recognized by all Christian nations; while the destruction of the existing relations between the two races, as advocated by our sectional enemies, would bring inevitable calamities upon both and desolation upon the fifteen slave-holding States."

To its shame, Dallas still honors the Confederacy, its institution of slavery and Confederate leaders. It is time for these memorials to come down. Some will argue that the Confederate monuments are "history." There is a fundamental difference, however, between history and propaganda. History does not have as its primary object glamorization. History is about analysis, context and explanation of the origins of ideas, institutions and events. Confederate memorials do none of these things.





Published August 30, 1962 - Rebel relatives rededicated the Confederate Monument Sunday in Pioneer Cemetery - a graveyard where the markers read like Dallas street signs. (JOE LAIRD - staff photographer / DMN file photo)

True Dallas heroes to memorialize

We should not continue to honor the Confederacy even as there are people who played a critical and positive role in Dallas history who receive inadequate or no tribute such as:

- **The African American slaves and sharecroppers** whose unpaid labor built the city's and the county's economy.
- **Carl Brannin**, who fought for the rights of workers in Dallas.
- **Maceo Smith**, who led voter registration and poll tax payment drives in Dallas and was the man most responsible for

the creation of the Hall of Negro Life, the only acknowledgement of the African-American contribution to Texas culture and history at the state's Centennial Fair held here in 1936.

- **John Leslie Patton**, a Dallas school principal who fought to bring a consciousness of African and African American history to black students in this city in the 1930s and 1940s.
- **John Mason Brewer**, who taught in this city in the 1930s and preserved for the ages Texas' African-American folklore.
- **Juanita Craft**, a leader of the Dallas NAACP, who battled to end segregation at the State Fair at Fair Park.
- **W.J. Durham**, a local NAACP attorney who fought to end discrimination against African-Americans at Neiman Marcus and other Dallas department stores.
- **John W. "Preacher" Hays**, who not only fought for Dallas workers but resisted racism within the white union movement.
- **Pancho Medrano**, a crusader for Latin, African-American, and workers' rights.
- **Rabbi Levi Olan**, an often-lonely voice for civil rights in Dallas in the late 1940s and the 1950s.
- **Adelfa Callejo**, who in 1961 became the first Latina to graduate from Southern

Methodist University's law school, who led protests against the murder of 12-year-old Santos Rodriguez by a Dallas police officer in 1973, who resisted selective and racist deportations of undocumented workers, and fought to democratize Dallas politics through single-member city council districts.

Confederate monuments, if left to stand, will proclaim a sad truth about Dallas to the world, that these accurately reflect the values of modern Dallas, despite any denials that this is so.

The residents of Dallas have to decide who they want to be. Do they want to be the residents of an American city with democratic values, who promote civil rights and racial equality? Or do they want to be residents of a Confederate city with plantation values, with the values of a hierarchical society of inequality?

Other cities have chosen the American future. The Charlottesville, Va., City Council voted to sell its Robert E. Lee statue. And this spring, the city of New Orleans made international headlines when it removed four monuments. Three were statues of Jefferson Davis, Confederate General P.G.T. Beauregard, and Robert E. Lee. The fourth was the so-called Liberty Place Monument, which glorified the attack by the White League, a Reconstruction-era racist organization that assaulted New Orleans' bi-racial police force and temporarily overthrew

a Republican governor accused of ushering in an era of "negro domination."

As New Orleans Mayor Mitch Landrieu said after the removal of the Lee statue in his city, "To literally put the Confederacy on a pedestal in our most prominent places of honor is an inaccurate recitation of our full past. It is an affront to our present, and it is a bad prescription for our future."



An Albert S. Johnston statue stands outside a Confederate memorial in Pioneer Park Cemetery in Dallas on Wednesday, June, 24, 2015. (Michael Reaves/The Dallas Morning News)
(Michael Reaves / Staff Photographer)

3 things Dallas can do

More and more cities are choosing to give up the Confederacy. We can do this also, if we are willing to confront the reality of what these Dallas Confederate monuments do.

1. We ask the citizens of Dallas to stop holding weddings, celebrations or other events at Robert E. Lee Park or any other location that celebrates or attempts to honor the Confederacy, and decline invitations to such events. We ask religious leaders not to perform weddings at Robert E. Lee Park or any other locations that celebrate the Confederacy, and we ask businesses to decline to provide goods or services at such venues.

2. We ask the city of Dallas to remove all Confederate monuments. We ask the city to eliminate Confederate place names such as Robert E. Lee Park and Confederate Drive. We ask the city not to celebrate or promote the Confederacy with sculpture and art work at Fair Park.

3. We ask Dallas ISD to rename all schools named after Confederate leaders: William Cabell, William H. Gaston, John Ireland, Sidney Lanier, Stonewall Jackson, Albert Sidney Johnston, John H. Reagan, and Oran M. Roberts and to not give the schools dual names under the pretext of historical preservation.

We ask the city of Dallas, the Dallas Independent School District, Dallas cultural

institutions, and the people of Dallas to choose a path to a multiracial democratic American society and away from the dark past of white supremacy.

Please **contact your city council members individually** and let them know your concerns about Confederate monuments.

*Michael Phillips is a history professor at Collin College and the author of "White Metropolis: Race, Ethnicity, and Religion in Dallas, 1841-2001." Email: **mphillips@collin.edu***

Edward Sebesta is the editor of "Neo-Confederacy: A Critical Introduction" and "The Confederate and Neo-Confederate Reader." Twitter: @EdwardHSebesta

They wrote this column for The Dallas Morning News on behalf of the group North Texans for Historical Justice. Other signatories to this column are:

Michael W. Waters, Senior Pastor, Joy Tabernacle A.M.E. Church

Imam Omar Suleiman, Adjunct Professor, Graduate Liberal Studies, Southern Methodist University and president of the Yaqeen Institute for Islamic Research and Resident Scholar at the Valley Ranch Islamic Center

Sara Mokuria, Co-founder, Mothers Against Police Brutality

John Fullinwider, Co-founder, Mothers
Against Police Brutality

Gerald Britt, Vice President, External Affairs
CitySquare

Eric Folkerth, Pastor, Northaven United
Methodist Church

Betsy Friauf, Independent Scholar and
Baylor University Charlton Oral History
Research Grantee

Ed Gray, Co-Chair of the Human Rights
Cluster, Southern Methodist University

Candace Bledsoe, Professor, Liberal Studies
Graduate Department and Director, Action
Research Center, SMU

James B. Briggs , Senior Pastor, Daybreak
Metropolitan Church

Neil G. Cazares-Thomas, Senior Pastor,
Cathedral of Hope United Church of Christ

Ed Countryman, history professor, SMU

David Cullen, Co-Editor of The Texas Left:
The Radical Roots of Lone Star Liberalism
and The Texas Right: The Radical Roots of
Lone Star Conservatism.

Rebecca David-Hensley, Member, North
Texas Conference, United Methodist Church

Rabbi Nancy Kasten, community educator
and co-chair, Faith Forward Dallas

Crista J. DeLuzio, associate history professor,
SMU

Darryl Dickson-Carr, chair and professor,
Department of English, SMU

W. Marvin Dulaney, associate history
professor emeritus, University of Texas at
Arlington

Jeffrey A. Engel, history professor and
director, Center for Presidential History,
SMU

Wendy Fenn, retired associate minister for
congregational life, Presbyterian Church USA

Neil Foley, history professor and co-director,
Center for Southwest Studies, SMU

Dennis Foster, English professor, SMU

Michael Gregg, pastor, Royal Lane Baptist
Church

Rick Halperin, director of the Embrey
Human Rights Program, SMU

Kenneth M. Hamilton, associate history
professor and director of ethnic studies, SMU

Hanan Hammad, associate history professor,
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Author of *Industrial Sexuality, Urbanization,
and Social Transformation in Egypt*.

Carl Hasler, independent scholar

Ben Anderson David Hensley, associate
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United Methodist Church

Constance Hilliard, history
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Education and director of the Center for
Evangelism and Missional Church
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Suzanne Jones, education professor, Collin
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and director, Comparative Race and Ethnic
Studies, TCU

John Richard Lundberg, history
professor, Tarrant County College

George A. Mason, senior pastor, Wilshire
Baptist Church

Henry L. Masters, Sr., retired pastor,
Hamilton Park, St. Paul and St. Luke
Community United Methodist Church

Alexis McCrossen, history professor, SMU

Donta McGilvery, founder, Dallas
Improvement Association, First Institutional
Baptist Church

Andrew Milson, professor and associate
chair, Department of History, UT Arlington

Heather Mustain, minister of missions,
Wilshire Baptist Church

Beth Newman, associate English professor,
SMU

Rabbi Andrew M. Paley, senior rabbi, Temple
Shalom

Chad Pearson, history professor, Collin
College

Patrick D. Price, minister, Community
Unitarian Universalist Church

Stephen Rabe, history professor, University
of Texas at Dallas

Milan Reban, political science professor
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Karen Romestan

Ariel Ron, assistant history professor, SMU

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Church and director of mentoring,
Champions of Hope

Lisa Roy-Davis, English professor, Collin
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Kerry Smith, pastor, Greenland Hills United
Methodist Church

Sherry Smith, history professor, SMU

William J. Stone Jr., associate
communications professor, UT Arlington

Robert Tinajero, English professor and
director of the Race Relations Institute, Paul
Quinn College

Lupita Murillo Tinnen, photographer,
educator and member, LULAC Professional
Leaders Council #22293

Keith Volanto, history professor, Collin
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Steven Weisenburger, English professor,
SMU

Kyle Wilkison, Historian

Byrd Williams, photography professor, Collin
College

Brian C. Wilson, adjunct English
professor, Tulsa Community College,
Southeast Campus

Steve Woodworth, history professor, TCU

Ben Wright, assistant professor of historical
studies, UT Dallas

Elaine Zweig, professor and lead,
Department of Child Development and
Education, Collin College

Beth Dana, minister of congregational
life, First Unitarian Church of Dallas

Elena Jeffus, Northpark Presbyterian

Anand Upadhyaya, student support and
community service, Dallas County
Community College District

William Carlisle, Bethel African Methodist
Episcopal Church

Ben A. David Hebskey, Oak Lawn United
Methodist Church

Elena Bonifay, chief operating officer, The
Dallas Weekly

Joreaner Stimpson, Joy Tabernacle AME
Church

Sherry Stewart, Trietsch Memorial United
Methodist Church

Dr. Adrian Clarke

Tom Green, retired First Assistant Attorney
General of Texas

Marjorie Hamilton Scott. St Luke AME
Church

Hillary Owen, Highland Park United
Methodist Church

Lilly Neubauer, Northaven United Methodist
Church

Imam Abdul Nasir Jangda, Qalam Institute
and Mansfield Islamic Center

Imam Yaser Birjas Issa, Valley Ranch Islamic
Center

Daniel Roby, executive director, Austin Street
Center

Pamela Young, community leader and
activist, Faith In Texas and Mothers Against
Police Brutality

Nadim Bashir, imam/head of religious affairs, EPIC East Plano Islamic Center

David Gruber, Interfaith Wedding Rabbi

Victoria Henderson, public school teacher

Abdul Rahman Bashir, imam and religious director, Islamic Association of Allen

Lisa McCarthy Stewart, director of outreach and missions, Highland Park United Methodist Church

Judith Kubliski, member, Community Unitarian Universalist Church-Plano

Khalid Shahid, imam, Dallas Masjid Al Islam

Muhammed Rizwan, Bangladesh Muslim Center

Jonathan Grace, Church at the Square, City Square

Patrick Salvant, The Oak Cliff Media Company

Hafsa-Wania Mohammed, student, UT Dallas

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Joseph Michael Phillips 3/22/2023

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS)
) CIVIL ACTION NUMBER
Plaintiff,)
)
v.) 4:22-cv-184
)
COLLIN COMMUNITY COLLEGE)
DISTRICT, et al.,)
)
Defendants.)

REPORTER'S CERTIFICATION OF
ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS
MARCH 22, 2023

I, BETH HOWARD, a Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, JOSEPH MICHAEL PHILLIPS, was duly
sworn and that the transcript of the oral deposition is
a true record of the testimony given by the witness;

That pursuant to information given to the deposition
officer at the time said testimony was taken, the
following includes all parties of record and the amount
of time used by each party at the time of the
deposition:

GREG GREUBEL, ESQ. (00 hours, 00 minutes)
Attorney for Plaintiff
CHARLES J. CRAWFORD, ESQ. (02 hours, 52 minutes)
Attorney for Non-Board of Trustee Defendants
ROBERT J. DAVIS, ESQ. (00 hours, 14 minutes)
Attorney for Defendant Board of Trustees

Joseph Michael Phillips 3/22/2023

1 I further certify that I am neither counsel for,
2 related to, nor employed by any of the parties or
3 attorneys in the action in which this proceeding was
4 taken, and further that I am not financially or
5 otherwise interested in the outcome of the action.

6 Certified to by me on this 31st day of March, 2023.

7
8
9
10 BETH HOWARD, TEXAS CSR 529
11 EXPIRATION DATE: 4/30/2025
12 Stormy Jackson Reporting
13 Firm Registration #610
14 1518 Clear Creek Drive
15 Allen, Texas 75002
16 214.491.0117
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25

Stormy Jackson Reporting
stormyrpr@outlook.com

Joseph Michael Phillips 3/22/2023

1 REPORTING FIRM FURTHER CERTIFICATION

2 That the deposition transcript was duly submitted on
3 April 3rd, 2023, to Greg Greubel, Esq. for examination,
4 signature and return to Stormy Jackson Reporting by
5 May 6th, 2023;

6 That I am neither counsel for, related to, nor
7 employed by any of the parties or attorneys in the
8 action in which this proceeding was taken, and further
9 that I am not financially or otherwise interested in the
10 outcome of the action.

11 Certified to by me on this 3rd day of
12 April, 2023.

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25

_____/s/ Stormy Jackson_____
STORMY JACKSON REPORTING
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Allen, Texas 75002
214.491.0117

Taxable cost of deposition transcript: \$1,558.50

Charged to Mr. Charles Crawford, Attorney for Defendants,
Collin Community College District, et al.